UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

Plaintiff,

v.

DONALD J. TRUMP, in his personal capacity,

Defendant.

Civil Action No.: 1:20-cv-7311-LAK-JLC

NOTICE OF MOTION TO STAY EXECUTION OF THE JUDGMENT PENDING DISPOSITION OF THE POST-TRIAL MOTIONS

PLEASE TAKE NOTICE that that the defendant, President Donald J. Trump, hereby moves this Court, before the Hon. Lewis A. Kaplan, United States District Judge for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007, on a date to be set by the Court, for entry of an order staying execution of the Judgment pending disposition of President Trump's forthcoming post-trial motions, pursuant to Rule 62 of the Federal Rules of Civil Procedure, and for such other relief that the Court may deem just and proper.

This motion is supported by the annexed memorandum of law, any arguments or evidence presented in reply, all arguments or evidence presented at a hearing or with leave of Court, and upon all prior proceedings, pleadings, and filings in this action.

Respectfully submitted,

Alina Habba, Esq.

Michael T. Madaio, Esq.

HABBA MADAIO & ASSOCIATES LLP 112 West 34th Street, 17th & 18th Floors

New York, New York 10120

(908) 869-1188

ahabba@habbalaw.com

D. John Sauer*

William O. Scharf*

JAMES OTIS LAW GROUP, LLC 13321 North Outer Forty Rd, St 300

Chesterfield, Missouri 63017

(314) 562-0031

John.Sauer@james-otis.com

Dated: New York, New York February 23, 2024

* pro hac vice forthcoming